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March 18, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

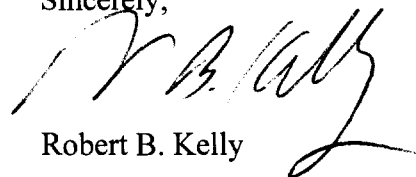
Re: KSI INC
Ex Parte Presentation
CC Docket No. 94-102

Dear Ms. Salas:

On Wednesday, March 17, 1999, Mark Hatten, Chairman of KSI INC. (KSI), and Robert B. Kelly and Kelly A. Quinn of Squire, Sanders & Dempsey, LLP, counsel to KSI met with James D. Schlichting, Deputy Chief of the Wireless Bureau, Robert Calaff, Associate Bureau Chief of the Wireless Bureau, and Ronald F. Netro of the Wireless Bureau.

In that meeting, the parties discussed Comments filed by the Phase II Working Group, of which KSI is a member, in response to the Wireless Bureau's December 24, 1998 Public Notice, KSI's Reply Comments to Waiver Requests of Section 20.18 of the Commission's rules, and the materials attached hereto, which were distributed during the discussion. Specifically, KSI urged the Commission to affirm its commitment to the provision of Phase II E911 location information by October 1, 2001 for all wireless callers.

Sincerely,


Robert B. Kelly

Cc: James D. Schlichting, Deputy Chief of the Wireless Bureau
Robert Calaff, Associate Bureau Chief of the Wireless Bureau
Ronald F. Netro

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KSI INC.
Summary *Ex Parte* Presentation
Docket 94-102
March 17, 1999

● **Who Are We?**

KSI is a privately held company located in Annadale, Virginia that has developed a successful wireless location system for automatically locating wireless transmitters.

KSI's TeleSentinel Location System can locate both analog (AMPS) and digital (TDMA) wireless phones.

KSI participated in FCC Docket 90-314 and industry discussions on wireless location services that proceeded the institution of Docket 94-102. KSI has also contributed to the record in every stage of this Docket.

● **Why Are We Here?**

The Wireless Bureau took action that KSI believes dramatically departed from the earlier decisions in Docket 94-102 in the form of its December 24, 1998 Public Notice outlining the guidelines for waivers for handset-based solutions for the provision of Automatic Location Identification Requirements.

The Public Notice released by the Wireless Bureau stands flatly in conflict with the Commission's commitment to the provision of Phase II E911 location information by October 1, 2001 for ALL wireless callers.

The Commission must take swift action to resolve the uncertainty created in the marketplace by the Public Notice's suggestion that the Commission might accept something less than the requirements repeatedly affirmed in the Commission's decisions to date.

● **What Do We Want?**

KSI seeks affirmation that the Commission remains committed to the October 1, 2001 deadline for Phase II implementation.

KSI believes that, for all of the reasons clearly articulated in its comments throughout this Docket, that the Commission must not grandfather the embedded base of handsets currently in the market. The Commission cannot allow an E911 Phase II ALI solution which does not include all existing wireless equipment.

The American public deserves no less than what the Commission has currently promised, and the public safety of citizens demands it.

KSI opposes the grant of waivers because such waivers are unnecessary and contrary to the public interest.

● **Current Rules Were Issued With Enough Time to Accommodate Technological Development.**

KSI's network solutions work today.

KSI invites the FCC to visit its headquarters in Annadale and witness first hand the company's ability to meet the Commission's Phase II requirements.

Network solutions can work in rural areas.

The industry clearly acknowledges the accuracy and methodology problems associated with GPS handset-based solutions.

● **Implications of Handset-Based Solutions.**

Handset-based solutions cannot accommodate roamers.

Wireless callers with legacy handsets will be undetectable.

There are significant costs associated with the replacement of handsets -- carriers acknowledge that handset-based solutions are only feasible if they do not have to replace legacy handsets.

There are terrain and location problems associated with signal transmissions.

It is uncertain whether such a handset will correspond with market demand for light weight, mobile phones with long battery lives.

Contrarily, its easier to upgrade cell sites than telephones.

In terms of public safety as the main objective, its uncontroverted that the Commission made the right choice by requiring ALI for all wireless callers.
